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Counsel for Objector Jill Mahaney

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK INC. CONSUMER)	MDL No. 2843
PRIVACY USER PROFILE LITIGATION)	
)	Case No. 18-md-2834-VC
)	
)	<u>CLASS ACTION</u>
)	
OPPOSITION OF CLASS)	DECLARATION OF JILL
This Document Relates to:)	MAHANEY IN SUPPORT OF
)	OPPOSITION OF SARAH
ALL ACTIONS)	FELDMAN AND JILL MAHANEY
)	TO PLAINTIFFS
)	ADMINISTRATIVE MOTION
)	FOR PARTIAL RELIEF FROM
)	STAY

I, Jill Mahaney, declare as follows:

1. I am a member of the settlement Class in the above class action and, through my attorney, I have filed an objection to the proposed settlement, the apportionment of the settlement recovery, and what Class Counsel is requesting the Court award them as attorneys' fees. I make this declaration in support of the Opposition of Class members/Objectors Sarah Feldman and Jill Mahaney to Plaintiffs Administrative Motion for Partial Relief from Stay.

2. I have been a Facebook user with a Facebook account since 2007. I personally filed a settlement claim, received a copy of my claim, and was assigned a correlation ID through, the settlement website.

3. I have spoken with my attorney, Kendrick Jan, a number of times about the proposed settlement and the attorneys' fees request in this case. During these meetings, my attorney provided me with perspective regarding the case and we discussed the issues set forth in my objection. What I know about the case, the proposed settlement, and the requested attorneys' fees is a product of my confidential communications with, and notated documents received from, my attorney, only. I do not recall reading anything else, or having discussions with anyone other than my attorney, regarding this case or the proposed settlement.

4. Prior to signing the confirmation of my objection, I had discussed with my attorney the contents of my written objection. Although I relied on my attorney to prepare my written objection, and to include in the objection legal authority and argument, my objections to the proposed settlement and requested attorneys' fees are as set forth in my objection filed as Document 1147.

5. I have never before made an objection to a class action settlement.

6. I have not received anything from my attorney or any third party for making my objection in this case, and absolutely nothing has been promised to me in connection with my role as an objector.

7. My attorney, Kendrick Jan, is my uncle and has served as my lawyer since at least 2015. I have never had a retainer agreement with my attorney or his office, whether in this matter or otherwise.

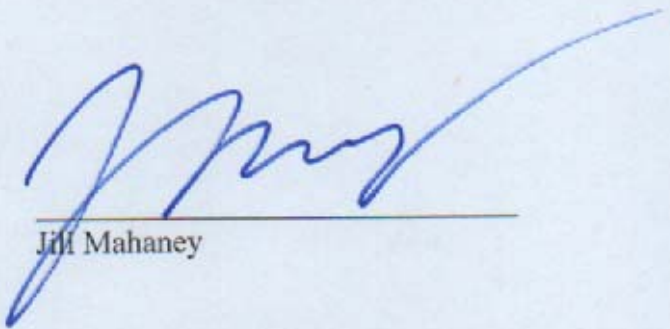
8. I have never met or spoken with attorney John Pentz and I have no retainer agreement with Mr. Pentz.

9. I believe the above answers all issues on which Class Counsel have indicated they seek to depose me and there is no other non-privileged information for Class Counsel to discover.

10. When I signed the confirmation of my objection, I had no idea Class Counsel or Facebook would be asking to take my deposition. The bulk of my work year is between June and October, during which period I work up to 16 hours per day and up to seven days per week. I am paid on an hourly and commission basis, and I am currently slated to work, both in and out of state during the next six weeks. Changing my work and travel schedule to prepare for and sit for a deposition would be a tremendous economic burden on me. I respectfully ask the Court to consider this when ruling on Plaintiffs' administrative motion.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: July 24, 2023



Jill Mahaney